

# GMM | Gimigliano Mauriello & Maloney

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February 10, 2022

VIA ECF

Honorable Edward S. Kiel, U.S.M.J.  
United States District Court, District of New Jersey  
Martin Luther King, Jr. Federal Building and Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: GEA Mechanical Equipment US, Inc. v. Federal Insurance Company et al.  
Case No.: 2:20-cv-9741 (BRM) (ESK)

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Dear Judge Kiel:

This firm represents defendants Hartford Accident and Indemnity Company, Hartford Fire Insurance Company and First State Insurance Company (collectively, "Hartford") in the above-referenced matter. On behalf of Hartford, defendants The Continental Insurance Company ("Continental") and Wellfleet New York Insurance Company as successor to Atlanta International Insurance Company ("AIIC" and, together with Hartford and Continental, the "Defendants"), and plaintiff GEA Mechanical Equipment US, Inc. ("Plaintiff"), we submit this joint letter in advance of the telephonic status conference in this matter scheduled for Wednesday, February 16, 2022.

This is an asbestos insurance coverage action. Plaintiff's complaint seeks a declaration regarding the parties' rights and duties with respect to a single underlying asbestos claim and future underlying asbestos claims under insurance policies issued by Defendants.

The parties are currently engaged in expert discovery. According to the current discovery schedule, expert depositions are to be completed by March 25, 2022. The parties have scheduled depositions of their respective experts and believe that they are on track to complete expert discovery by the current deadline.

The parties are currently discussing potential amendments to the briefing schedule for dispositive motions, which changes are intended to streamline the motions for both the Court and the parties. We anticipate submitting a proposed order in that regard for Your Honor's consideration in the next few weeks.

**Gimigliano Mauriello & Maloney, P.A.**

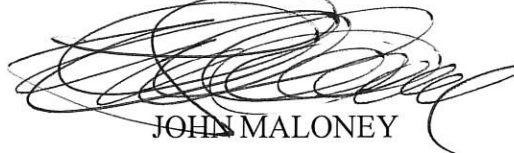
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We thank Your Honor for the time and courtesies extended in this matter. We look forward to speaking with Your Honor on Wednesday.

Respectfully,

A handwritten signature in black ink, appearing to read "John Maloney", is written over the printed name. The signature is stylized with loops and flourishes.

JOHN MALONEY

cc: All counsel of record (via ECF)